

JEFFREY L. KESSLER (*Admitted Pro Hac Vice*)

A. PAUL VICTOR (*Admitted Pro Hac Vice*)

DEWEY & LEBOEUF LLP

1301 Avenue of the Americas

New York, NY 10019

Telephone: (212) 259-8000

Facsimile: (212) 259-7013

Email: jkessler@dl.com

STEVEN A. REISS (*Admitted Pro Hac Vice*)

DAVID L. YOHAI (*Admitted Pro Hac Vice*)

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153-0119

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Email: steven.reiss@weil.com

*Attorneys for Defendants Panasonic Corporation of North America, MT Picture Display Co., Ltd.,
and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)*

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST) Case No. 07-5944 SC
LITIGATION)

This Document Relates to:

ALL ACTIONS

) DECLARATION OF JEFFREY KESSLER
) IN SUPPORT OF ADMINISTRATIVE
) MOTION TO FILE CONFIDENTIAL
) DOCUMENTS UNDER SEAL

DECLARATION OF JEFFREY KESSLER

I, Jeffrey Kessler, declare as follows:

1. I am an attorney with Dewey & LeBoeuf LLP, attorneys for Defendants

Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation
(f/k/a Matsushita Electric Industrial Co., Ltd.) in this action. I am a member of the bar of the State

- 1 -

DECLARATION OF JEFFREY KESSLER IN SUPPORT OF THE ADMINISTRATIVE MOTION TO FILE
CONFIDENTIAL DOCUMENTS UNDER SEAL

Case No. 07-5944 SC

MDL NO. 1917

1 of New York and am admitted to practice before this Court *pro hac vice*. I make this Declaration in
2 support of the administrative motion to file confidential documents under seal and to redact
3 confidential information. If called as a witness, I could, and would, testify to the matters set forth in
4 this declaration of my own personal knowledge.

5 2. Exhibits G through P, attached to the Declaration of Jeffrey Kessler in
6 Support of Defendants' Motion for Sanctions Pursuant to Rule 11, should be filed under seal as they
7 are confidential, as designated by Chunghwa Picture Tubes, Ltd.

8 3. Defendants' Motion for Sanctions Pursuant to Rule 11 and Exhibits A, C, E,
9 and F to the Declaration of Jeffrey Kessler in Support of Defendants' Motion for Sanctions Pursuant
10 to Rule 11 should be redacted according to the narrowly tailored versions lodged with the court in
11 order to protect information contained therein designated as confidential by Chunghwa Pictures
12 Tubes, Ltd.

13 4. I declare under penalty of perjury that the foregoing is true and correct to the
14 best of my knowledge.
15

16
17
18 Dated: April 14, 2011

19
20
21 /s/ Jeffrey L. Kessler
Jeffrey L. Kessler